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December 30, 1986

Ms. Denise Gruben  
Department of Natural Resources  
Groundwater Quality Division  
Remedial Action Section  
Site Assessment Unit  
P.O. Box 30028  
Lansing, Michigan 48909

Re: Act 307 Listing of Ren Plastics, Dawn Avenue Site,  
Code Number: 33-04N-01W-20AB, Ingham County

Dear Ms. Gruben:

Ren Plastics ("Ren") submits these comments regarding the current and the proposed listing of the above-referenced site (the "Site") on the "Michigan Sites of Environmental Contamination Proposed Priority Lists -- Act 307."

Ren requests that the DNR revise the existing and proposed Site Assessment System ("SAS") Screen Score for the Site. The Site was Screened on October 4, 1984, and received a Screen Score of "8". Since that time, Ren has completed cleanup actions that have eliminated the conditions for which the Site was scored. In light of the cleanup work and the current condition of the Site, as further described below, Ren believes that the Site should be removed from the Act 307 Priority List.

The SAS, published in 1983, requires that the scoring process for an individual site comply with the technical requirements of the SAS model. Since the SAS is designed to measure the relative risk presented by a site, any failure to comply with the SAS frustrates the intent of the system and results in a score that misrepresents the risk associated with the site.

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According to the DNR's description of the SAS, the SAS "ranks sites according to their present conditions...." (See p. 4 of the Proposed Priority List). In addition, Section 3.1 of the SAS recognizes that scores must be updated when remedial measures are taken: "documentation also facilitates updating of site scores as additional information becomes available or interim measures or remedial actions are applied." In other words, SAS scoring must be based on current conditions and reflect any change in conditions resulting from remedial action.

These provisions of the SAS require that the DNR revise the Screen Score for the Site in light of the remedial actions taken by Ren. The matters of concern at the Site, as determined by sampling and investigation conducted at the direction of DNR's Region III office, were as follows: (1) contamination in the area of the underground storage tank farm located at the Site; and (2) contamination resulting from a spill of propylene oxide which occurred at the site and was reported to the DNR. Acting in cooperation with the DNR's Region III office, Ren took remedial action to remove the contamination in these areas. The underground storage tanks and piping were removed from the site. In addition, the contaminated soils in the tank farm area were excavated and removed. Soil borings had confirmed that the soil contamination was contained by a clay layer underlying the site. Similar action was taken regarding the propylene oxide spill. Contaminated soils in the area of the leak and under an adjacent pumphouse were excavated and removed. The above-described remedial actions are further explained in the enclosed reports prepared by Snell Environmental Group, Inc. and Keck Consulting Services, Inc.

Region III did not require remedial action for groundwater because site investigations had demonstrated that the shallow aquifer in the area was perched on a shallow clay layer and was not well developed. A copy of the hydrogeological investigation is enclosed.

In short, the remedial actions taken by Ren have addressed and eliminated the conditions for which the Site was scored. In its current condition, there is no basis to include the Site on the Act 307 Priority List. Ren submits that the DNR should consider the Site based on its current conditions and remove the Site from the Priority List.

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Ren appreciates your consideration of these comments. If you need additional information in order to evaluate the Site, please contact me or John Dunn of this office.

Respectfully submitted,

/s/

Michael L. Robinson

mg  
enc.

✓ cc w/enc: Mr. Daniel O. Cummins  
DNR Lansing Compliance District